

LAW OFFICES OF NEIL JON BLOOMFIELD

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Attorneys for Defendant
ULI ZANGPO

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

MARK MORRISON.
Plaintiff,

vs.

ULI ZANGPO,
Defendant.

) No. CV 08 1945 EMC

)

) **DECLARATION OF NEIL JON**
) **BLOOMFIELD IN SUPPORT OF**
) **MOTION TO EXTEND THE DATE OF**
) **THE INITIAL CASE MANAGEMENT**
) **CONFERENCE**

)

I, Neil Jon Bloomfield, declare as follows:

1. I am the attorney for Defendant Uli Zangpo.

2. Defendant is requesting that the date of the Case Management Conference be extended so that the Court has the opportunity to determine whether it has jurisdiction over the parties prior to the Case Management Conference, and so that the Court has the opportunity to determine whether the agreement of the parties that no discovery or depositions will be permitted supersedes the parties' discovery rights and obligations under the Federal Rules of Civil Procedure and the Northern District Civil Local Rules.

3. On June 16, 2008, I asked Plaintiff, through his counsel, whether he would stipulate to change the date of the Initial Case Management Conference. As of late afternoon on June 17, I have had no response.

